

EXHIBIT D

IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION
Confidential **Becky Weiss on 10/29/2020**

Confidential Pursuant to Protective Order
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

IN RE: CAPITAL ONE § MDL NO.
CONSUMER DATA SECURITY § 1:19md2915 (AJT/JFA)
BREACH LITIGATION §
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VIDEOTAPED DEPOSITION OF  
BECKY WEISS  
CONDUCTED REMOTELY

9:33 a.m. EST  
Thursday, the 29th day of October 2020

Blanche J. Dugas, CRR, RPR, CCR No. B-2290

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1 APPEARANCES OF COUNSEL VIA VIDEOCONFERENCE

2 On Behalf of the Plaintiffs:

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12 On Behalf of the Capital One Defendants:

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20 On Behalf of the Amazon Defendants:

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Also Present:

James Downie, videographer  
Jennifer Cabezas, paralegal

1 AWS\_CAP00057385. This is another Chime conversation.  
2 There's a lot of folks referenced here. Your name  
3 appears on Page 4, so I think you're involved in this  
4 conversation. I'm not sure if looking at the names  
5 that are referenced throughout it you can identify  
6 what this -- what the collective here is, like, how  
7 all these folks are connected or not.

8 (Plaintiffs' Exhibit 399 was marked  
9 for identification.)

10 THE WITNESS: I am still looking for  
11 my name. Do you have an approximate  
12 timestamp?

13 Q. (By Mr. Barthle) So if you go to Page 4,  
14 just put that into the box there, it's on  
15 January 20th, 2020, 16:56:58. There's no message,  
16 it's redacted, but your name is -- your handle is --

17 A. Okay. So January 20th is going to be higher  
18 up.

19 Q. Yes, ma'am. Right there.

20 A. Okay. That is my name.

21 Q. Okay. So first question: There's a lot of  
22 names in this chat. Do you have any idea of what this  
23 sort of group chat might be?

24 A. Not specifically, no.

25 Q. All right. I want to direct your attention

1 to Page 66, and it's toward the bottom of this page,  
2 it's at 1554. My first question for you is who is

4 A. I don't know.

5 Q. And then the one below him,

7 A. He's a solutions architect.

8 Q. Do you -- what's his name?

9 A. We all call him Squigg. I think his name is  
10 Steven Quigg.

11 Q. All right. My questions here relate to the

14 you could just read those.

15 A. Okay. You want this and the one above it?

16 Q. Yes, ma'am.

17 A. Okay. I've read it.

24 Q. Do you recall seeing any of these messages  
25 on this day, on July 30th, 2019?

1 A. No.

[REDACTED]

18 Do you see that part?

19 A. I do.

[REDACTED]

22 MR. NEWBY: Objection to form.

23 THE WITNESS: Can you ask that again?

[REDACTED]



1 MR. NEWBY: Same objection.

[REDACTED]

1 MR. NEWBY: Objection to form.

[REDACTED]

8 A. It's tautologically true that S3 is part of  
9 AWS, and therefore S3 -- S3 is in the cloud.

[REDACTED]

14 Do you see that?

15 A. Yes.

[REDACTED]

18 A. I'm not sure.

19 MR. BARTHLE: Tyler, I'd ask for a  
20 business records -- authenticity and  
21 business records stipulation as to this  
22 exhibit.

23 MR. NEWBY: I'll stipulate as to  
24 authenticity of the exhibit, but not to  
25 business records of the entire exhibit.



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1 DISCLOSURE

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3 Pursuant to Article 10.B of the Rules  
4 and Regulations of the Board of Court  
5 Reporting of the Judicial Council of  
6 Georgia which states: "Each court reporter  
7 shall tender a disclosure form at the time  
8 of the taking of the deposition stating the  
9 arrangements made for the reporting  
10 services of the certified court reporter,  
11 by the certified court reporter, the court  
12 reporter's employer or the referral source  
13 for the deposition, with any party to the  
14 litigation, counsel to the parties, or  
15 other entity. Such form shall be attached  
16 to the deposition transcript," I make the  
17 following disclosure:

18

19 I am a Georgia Certified Court  
20 Reporter. I am here as a representative of  
21 Huseby Global Litigation. Huseby Global  
22 Litigation was contacted to provide court  
23 reporting services for the deposition.  
24 Huseby Global Litigation will not be taking  
25 this deposition under any contract that is  
prohibited by O.C.G.A. 9-11-28(c).

Huseby Global Litigation has no  
contract/agreement to provide reporting  
services with any party to the case, any  
counsel in the case, or any reporter or  
reporting agency from whom a referral might  
have been made to cover this deposition.

18

Huseby Global Litigation will charge  
its usual and customary rates to all  
parties in the case, and a financial  
discount will not be given to any party to  
this litigation.

21



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Blanche J. Dugas  
CCR No. B-2290

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1 STATE OF GEORGIA:

2 COUNTY OF FULTON:

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4 I hereby certify that the foregoing  
5 transcript was reported, as stated in the  
6 caption, and the questions and answers  
7 thereto were reduced to typewriting under  
8 my direction; that the foregoing pages  
9 represent a true, complete, and correct  
10 transcript of the evidence given upon said  
11 hearing, and I further certify that I am  
12 not of kin or counsel to the parties in the  
13 case; am not in the employ of counsel for  
14 any of said parties; nor am I in any way  
15 interested in the result of said case.

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BLANCHE J. DUGAS, CCR-B-2290

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